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April 12, 2018

**By ECF and Hand Delivery**The Honorable P. Kevin Castel  
U.S. District Court, Southern District of New York  
Daniel Patrick Moynihan U.S. Courthouse  
500 Pearl Street  
New York, NY 10007-1312*Valassis Communications, Inc. v. News Corporation, et al.,*  
No. 1:17-cv-07378-PKC (S.D.N.Y.)

Dear Judge Castel:

We represent Defendants (collectively, "NAM") in the above-captioned action. We write to seek the Court's guidance with respect to the filing of NAM's motion for summary judgment, which is due tomorrow, April 13, 2018.

On April 6, 2018, NAM and Plaintiff ("Valassis") each moved for permission to redact limited categories of information reflected in certain documents that one or both parties have designated as confidential under the protective order in this case, and which NAM intends to file as exhibits to its motion for summary judgment. (*See* Dkts. 192-95 (Valassis motion); 196-99 (NAM motion).) Those motions remain pending.

NAM respectfully proposes, consistent with prior orders in this matter (Dkts. 150, 166, 174), that it be permitted to file tomorrow via ECF (i) versions of the

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The Honorable P. Kevin Castel

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exhibits to its motion for summary judgment reflecting the redactions proposed by NAM and Valassis, and (ii) versions of NAM's memorandum of law and Rule 56.1 statement of undisputed material facts with redactions applied to material that expressly refers to the redacted portions of the exhibits. NAM will serve Valassis with unredacted copies, and promptly deliver unredacted courtesy copies of the exhibits and motion papers to Chambers.

We respectfully request that Your Honor so order the above approach if it is suitable to the Court. Of course, we will proceed in any manner that the Court directs.

Respectfully submitted,

/s/ William B. Michael  
William Michael

cc: Counsel of Record